

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, David Pawson, being first duly sworn, hereby state as follows:

**INTRODUCTION AND INVESTIGATOR BACKGROUND**

1. I have been employed as a Special Agent (“SA”) of U.S. Department of Homeland Security, Homeland Security Investigations (“HSI”), since 2009, and am currently assigned to Portland, Maine. While employed by HSI, I have investigated federal criminal violations related to high technology and cybercrime, child exploitation, and child pornography. I have gained experience through training at the Federal Law Enforcement Training Center located in Brunswick, Georgia and my work often relates to conducting these types of investigations. I have received training in the area of child pornography and child exploitation and have had the opportunity to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media including computer media.

2. Moreover, I am a federal law enforcement officer who is engaged in enforcing the criminal laws, including 18 U.S.C. §§ 2251, 2252, and 2252A, and I am authorized by law to request an arrest warrant and a search warrant.

3. I am presenting this affidavit in support of the issuance of a criminal complaint charging Clifton Given with possession of child pornography, in violation of 18 U.S.C. § 2252A(a)(5)(B), (b)(2); 2256(8)(A).

4. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint. The facts set forth in this affidavit are based upon my personal knowledge, information obtained during my participation in this investigation, my review of documents and computer records related to this investigation, and information gained through my training and experience.

**PROBABLE CAUSE**

5. On June 16, 2020, I applied for a warrant authorizing the search and seizure of the property located at 26 Hall Road in Woolwich, Maine, the content of electronic storage devices located therein, for contraband and evidence, fruits, and instrumentalities of violations of 18 U.S.C. § 2252A(a)(5)(B) and (b)(2) (possession of and access with intent to view child pornography). That warrant was authorized by United States Magistrate Judge Nivison on June 16, 2020.

6. On June 18, 2020, a team of HSI Special Agents and Deputies of the Sagadahoc County Sheriff and I executed that federal search warrant at 26 Hall Road in Woolwich, Maine. Following an on-site preview of multiple devices at the residence, a single Samsung cell phone assigned International Mobile Equipment Identity (IMEI) number 35334210079669 was identified as containing the appropriate applications and software required to access the dark web.

7. On the same day, Special Agent Marty Conley and I conducted a non-custodial interview of Given during which he told us the Samsung cell phone is his and it is the only device that he used to access the dark web. Given told us that although he has seen child pornography on the dark web with this device, his intended purpose was to purchase cocaine and import the controlled substance into the United States to replace income being lost due to issues at Given's current employer, Bath Iron Works. Given admitted that during a forensic analysis of the device, four files containing child exploitation material would be found by Agents.

8. On June 19, 2020 Computer Forensics Agent (CFA) Anthony Castellanos initiated a forensic examination on Given's Samsung cell phone. CFA Castellanos then told me

that he had located many videos that had downloaded onto the Samsung cell phone depicting child exploitation material.

9. On June 22, 2020 I met with CFA Castellanos to view a sample of files recovered from Given's cell phone child exploitation material. I viewed the following three files:

10. bbyrape: Is a 37-second-long video depicting a child approximately 12 months of age lying face down and nude with an adult nude male straddling the baby's legs and masturbating and spanking the baby's buttocks with his erect penis. From out of the frame, what appears to be a woman's hand reaches in and parts the baby's buttocks exposing its anus. The adult male then penetrates the baby.

11. pedomom ass fuck toddler: Is a 1:17 minute long video depicting a nude female toddler approximately three to four years of age lying on her back with her knees pulled to her chest. Crouched in between the toddler's legs is an adult female where a prosthetic penis positioned on the toddler's anus. The woman then penetrates the toddler's anus repeatedly. The child appears to be pushing the woman away with her hands and feet while the woman forcefully controls the toddler's legs. The woman then turns the child over and positions her on her hands and knees. The woman then forcefully penetrates the child's anus. The woman can then be seen spanking the child's buttocks.

12. Young\_5yo\_struggles\_to\_take\_man\_up\_her\_ass: This is a 57 second video of a nude female child approximately five years of age lying on her back with her legs over her head. Positioned at the child's buttocks and kneeling is a nude adult male penetrating the child's anus with an erect penis. The adult male then moves the child's hands to her vagina where she masturbates simultaneously.

**CONCLUSION**

13. Based on the foregoing, I submit that probable cause exists to believe that on June 18, 2020, Clifton Given knowingly possessed a Samsung cellular telephone containing images of child pornography that had been transported in or affecting interstate commerce. I therefore request that the Court issue a criminal complaint and arrest warrant charging him with this offense.

Dated at Portland, Maine this 25th day of June, 2020.

*David Pawson*

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David Pawson  
Special Agent  
Homeland Security Investigations

Sworn to telephonically and signed electronically in accordance with the requirements of Fed. R. Crim P. 4.1

Sworn to and subscribed before \_\_\_\_\_, 2020.

Date and Time: 6/25/2020 10:12AM

City and State: Portland, Maine



John H. Rich III,  
U.S. Magistrate Judge

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John H. Rich III  
U.S. Magistrate Judge